UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TOBIAS MOELLER-BERTRAM, individually, and on behalf of all others similarly situated,

Plaintiff,

Case No. 1:23-cv-02027

v.

Hon. Lewis J. Liman

GEMINI TRUST COMPANY, LLC; and DIGITAL CURRENCY GROUP, INC.,

Defendants.

NOTICE OF MOTION TO TRANSFER TO DISTRICT OF CONNECTICUT

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the declaration of Caroline Zalka, dated May 23, 2023 with exhibits attached thereto, Defendant Digital Currency Group, Inc., by and through its undersigned counsel, will move this Court before the Honorable Lewis J. Liman, at the United States Courthouse, 500 Pearl Street, New York, New York, 10001, for an Order, pursuant to 28 U.S.C. § 1404(a), transferring this case to the United States District Court for the District of Connecticut, and for any further relief that the Court may deem just and proper.

Dated: May 23, 2023

Respectfully Submitted,

WEIL, GOTSHAL & MANGES LLP

/s/ Jonathan D. Polkes

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